

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MARY KILBRIDE

Plaintiff,

-against-

07-CIV-7092

MERRILL LYNCH & CO., INC. BASIC LONG-TERM DISABILITY PLAN, ADMINISTRATOR OF MERRILL LYNCH & CO., INC. BASIC LONG-TERM DISABILITY PLAN, MERRILL LYNCH & CO., INC., TRUSTEES OF MERRILL LYNCH & CO., INC. BASIC LONG-TERM DISABILITY PLAN, METROPOLITAN LIFE INSURANCE CO., MERRILL LYNCH DISABILITY SERVICE CENTER, MERRILL LYNCH & CO., INC. MEDICAL PROGRAM, MERRILL LYNCH & CO, INC. DENTAL PLAN, AND MERRILL LYNCH & CO., INC. LIFE INSURANCE PROGRAM

Defendants.  
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**JOINT MOTION TO EXTEND TIME  
TO FILE RESPONSIVE PLEADINGS TO PLAINTIFF'S COMPLAINT**

COMES NOW Plaintiff Mary Kilbride ("Plaintiff") and Defendants Merrill Lynch & Co., Inc. Basic Long Term Disability Plan, Merrill Lynch & Co., Inc. in its capacity as the Plan Administrator for the Merrill Lynch & Co., Inc. Basic Long Term Disability Plan; and on behalf of the Defendants described as Trustees of the Merrill Lynch & Co., Inc. Basic Long-Term Disability Plan, Merrill Lynch & Co., Inc. Medical Program, Merrill Lynch & Co., Inc. Dental Plan, and Merrill Lynch & Co., Inc. Life Insurance Program (collectively "Merrill Lynch" or "Defendants") and respectfully request that this Court provide the Merrill Lynch Defendants an additional three (3) weeks until September 25, 2007, to respond to Plaintiff's Complaint. In support of this joint motion, the parties state as follows:

1. Plaintiff filed her Complaint in the Southern District of New York against Defendants on August 9, 2007. Service was perfected to the Merrill Lynch Defendants on August 13, 2007. The undersigned counsel was recently retained and needs additional time to file responsive pleadings.

2. No prejudice will result to any party from the granting of this request for an extension.

WHEREFORE, PREMISES CONSIDERED, the Merrill Lynch Defendants respectfully request an additional three (3) weeks, until September 25, 2007, to file their responsive pleadings in the above-referenced lawsuit.

/s/ Christopher Dagg

Christopher Dagg (CWD5395)

**Legal Services for the Elderly**

Attorneys for Plaintiff

Mary Kilbride

130 West 42<sup>nd</sup> Street, 17<sup>th</sup> Floor

New York, New York 10036-7803

(646) 442-3316 Direct Telephone

(212) 391-0120 Office Telephone

(212) 719-1939 Facsimile

/s/ William B. Wahlheim, Jr.

William B. Wahlheim, Jr.

John David Collins

Attorneys for Defendants

Merrill Lynch

**OF COUNSEL:**

MAYNARD, COOPER & GALE, P.C.

2400 AmSouth/Harbert Plaza

1901 Sixth Avenue North

Birmingham, AL 35203-2602

(205) 254-1000